

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK
WHITE PLAINS DIVISION

HEARING DATE: October 7, 2020
HEARING TIME: 9:30 A.M.

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CHAPTER 13

IN RE:

CASE NO. 20-22920-SHL

John J. Inzeo and Dana L. Inzeo,

Assigned to:
Hon. Sean H. Lane

Debtor(s).

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OBJECTION TO CONFIRMATION OF THE PLAN

Karen B. Migdal, the undersigned, does hereby affirm to be true, under the penalties of perjury as follows:

1. I am an attorney duly admitted to practice in the State of New York and before the United States District Court for the Southern District of New York. As the attorney for Matrix Financial Services Corporation (hereinafter the "Secured Creditor"), I am fully familiar with the facts and circumstances set forth herein. I submit this Affirmation in opposition to the plan submitted by the debtor.

2. Secured Creditor is the holder of a first mortgage secured by the debtor's residence located at 7 Virginia Street, New City, NY 10956 with an unpaid principal balance due in the amount of \$280,804.06.

3. Matrix Financial Services Corporation will be filing a proof of claim for the first mortgage with arrears set forth at the time of filing estimated to be \$4,124.99. The proof of claim will be filed by the bar date established by the Court. Said bar date is October 15, 2020.

4. The Debtor's proposed Plan fails to provide for the payment of arrears. The estimated amount to cure the mortgage arrears is \$4,124.99. Matrix Financial Services Corporation rejects the Plan. Thus, the proposed Plan cannot be confirmed under Bankruptcy Law. 11 U.S.C. Section 1325 (a) (5) (A), (B).

WHEREFORE, Matrix Financial Services Corporation rejects the debtor's Plan, as proposed, and respectfully requests that the confirmation of the Chapter 13 Plan be denied, together with such other and further relief against the debtor as this Court deems just and proper.

Dated: August 25, 2020
Carle Place, New York

STEIN, WIENER & ROTH, L.L.P.

Karen B Migdal

Digitally signed by Karen B Migdal
DN: cn=Karen B Migdal, o=SWR, ou,
email=kmigda@hhstein.com, c=US
Date: 2020.08.26 09:43:13 -04'00'

BY: Karen B. Migdal, Esq.
Attorneys for Matrix Financial Services Corporation
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TO: Michael A. Koplen
Debtor's Attorney
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Krista M. Preuss
Trustee
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White Plains, NY 10603

John J. Inzeo and Dana L. Inzeo
Debtor
7 Virginia Street
New City, NY 10956

U.S. Trustee
U.S. Federal Office building
201 Varick Street, Room 1006
New York, NY 10014

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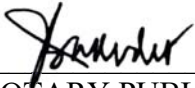
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77832/DOVEN

- 4) U.S. Trustee
U.S. Federal Office Building
201 Varick Street, Room 1006
New York, NY 10014

/s/ Jennifer Schlander

Jennifer Schlander

Sworn to before me this
26th day of August, 2020



NOTARY PUBLIC

BERNADETTE Z. NATI-RODEO

NOTARY PUBLIC, STATE OF NEW YORK

Commission No. 01NA6311389

Qualified in Queens County

Commission Expires September 15, 2022